

## UNITED STATES DISTRICT COURT

Northern District of Mississippi

Oxford Division

GEORGE WELCH \_\_\_\_\_ )

*Plaintiff* \_\_\_\_\_ )

Civil Action No. 3:20-CV-00122-NBB-JMV

v. \_\_\_\_\_ )

CITY OF HERNANDO, MISSISSIPPI, ET AL. \_\_\_\_\_ )

*Defendants* \_\_\_\_\_ )**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Mercedez Benz of Collierville, ATTN: Human Resources Department, 4651 South Houston Levee Road, Collierville, Tennessee 38017

*Production:* **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

See Exhibit "A" attached hereto.

Place: <b>Phelps Dunbar Law Firm, Attention: Debra Hardwick, P.O. Box 16114, Jackson MS 39236</b>	Date and Time: <b>02/18/2021 9:00 a.m.</b>
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*Inspection of Premises:* **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: \_\_\_\_\_ Date and Time: \_\_\_\_\_

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 2/2/21*CLERK OF COURT*

OR

*Signature of clerk or Deputy Clerk*


Attorney Signature

The name, address, e-mail, and telephone number of the attorney representing (*name of party*) \_\_\_\_\_Defendants, **City of Hernando, Mississippi, et al.** \_\_\_\_\_, who issues or requests this subpoena, are:

**Mallory K. Bland; MB #105665; Phelps Dunbar, LLP, 4270 I-55 North; Jackson, MS 39211-6391; 601-352-2300;**  
**Mallory.Bland@phelps.com**

EXHIBIT "A"

**SUBPOENA DUCES TECUM  
EXHIBIT "A"**

Please produce a complete copy of any and all employment records concerning George Welch, including but not limited to, any and all personnel records, applications for employment, pre-employment physical, alcohol and drug testing results, job description, earnings, W2's, 1099's, payroll records, loans and benefits history, employee health records, medical insurance application and medical claims records, on the job accident reports, incident statements, witness statements, workers compensation records, independent contractor records, or other records that you may have in any way pertaining to Mr. Welch's employment or for which he received compensation from your company.